

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

JAMIE HOFF

Plaintiff,

v.

CONSUMER ADJUSTMENT COMPANY,  
INC.

Defendant.

CASE NO.:

**DEFENDANT'S NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1446(a) and (b), the Defendant Consumer Adjustment Company, Inc. ("Defendant"), hereby removes this case to the United States District Court for the Eastern District of Missouri, Eastern Division based on the following grounds:

**THE REMOVED ACTION**

1. Consumer Adjustment Company, Inc. is a Defendant in a civil action that was brought on or about August 13 2012, by Jamie Hoff in the 11th Judicial Circuit Court, St. Charles County, Missouri

**FEDERAL QUESTION**

2. This action is removable to the United States District Court under 28 U.S.C. §§ 1331 and 1441 on the grounds of federal question jurisdiction, in that the complaint purports to allege a cause of action under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692, *et seq.*

**THE REMOVAL IS TIMELY**

3. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty days after Defendant's receipt of the initial pleadings setting forth the claim for relief upon which this action is based.

**PAPERS FROM REMOVED ACTION**

4. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit "A" are copies of the following documents, which are all the process, pleadings and orders received by Defendant in this action.

**FILING OF REMOVAL PAPERS**

5. Upon receipt of this Notice, no further action shall be taken in the 11th Circuit Court, St. Charles County, State of Missouri.

6. By filing this Notice of Removal, the Defendant demonstrates their consent to the removal of the case to this Court.

WHEREFORE, Defendants do hereby remove the above captioned action from the 11th Judicial Circuit Court, St. Charles County, Missouri, and requests that further proceedings be conducted in this Court as provided by law.

Respectfully submitted,

FRANKEL, RUBIN, BOND, DUBIN,  
SIEGEL & KLEIN, P.C.

By Mayer S. Klein  
MAYER S. KLEIN, #MO32605  
mklein@frankelrubin.com  
Counsel for Defendant  
231 South Bemiston Avenue, Suite 1111  
Clayton, Missouri 63105  
Telephone: (314) 725-8000  
Facsimile: (314) 726-5837

**CERTIFICATE OF SERVICE**

This is to certify that on September 14, 2012, I have filed electronically a copy of the within and foregoing Defendant's Notice of Removal in the United States District Court for the Eastern District of Missouri, Eastern Division through the Courts electronic filing system to:

Richard A. Voytas, Jr.  
James W. Eason  
Eason & Voytas, LLC  
1 North Taylor Ave.  
St. Louis, Missouri 63108  
*Attorneys for Plaintiff*

/S/ MAYER S. KLEIN  
MAYER S. KLEIN